

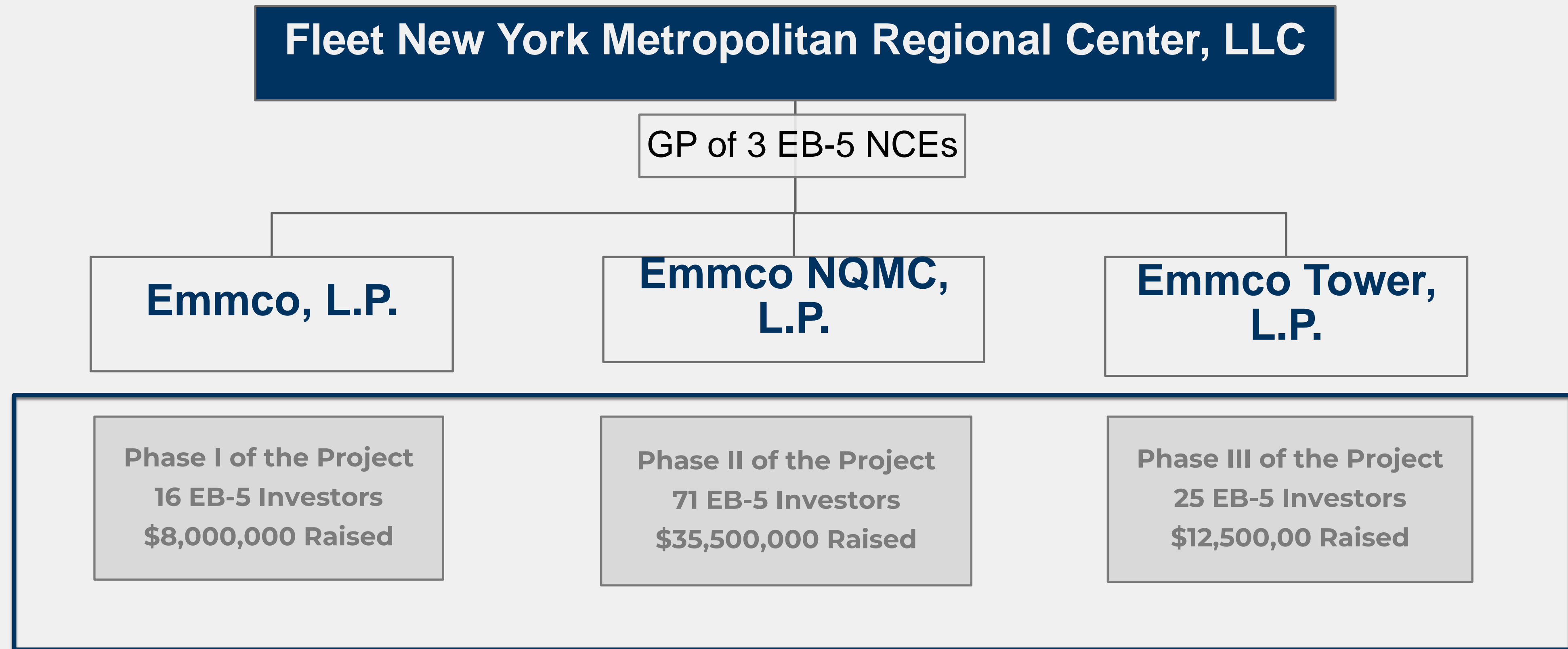
OVERVIEW

**EASTERN MIRAGE PROJECT
EASTERN EMERALD PROJECT**

John Leo
For Discussion Purposes Only

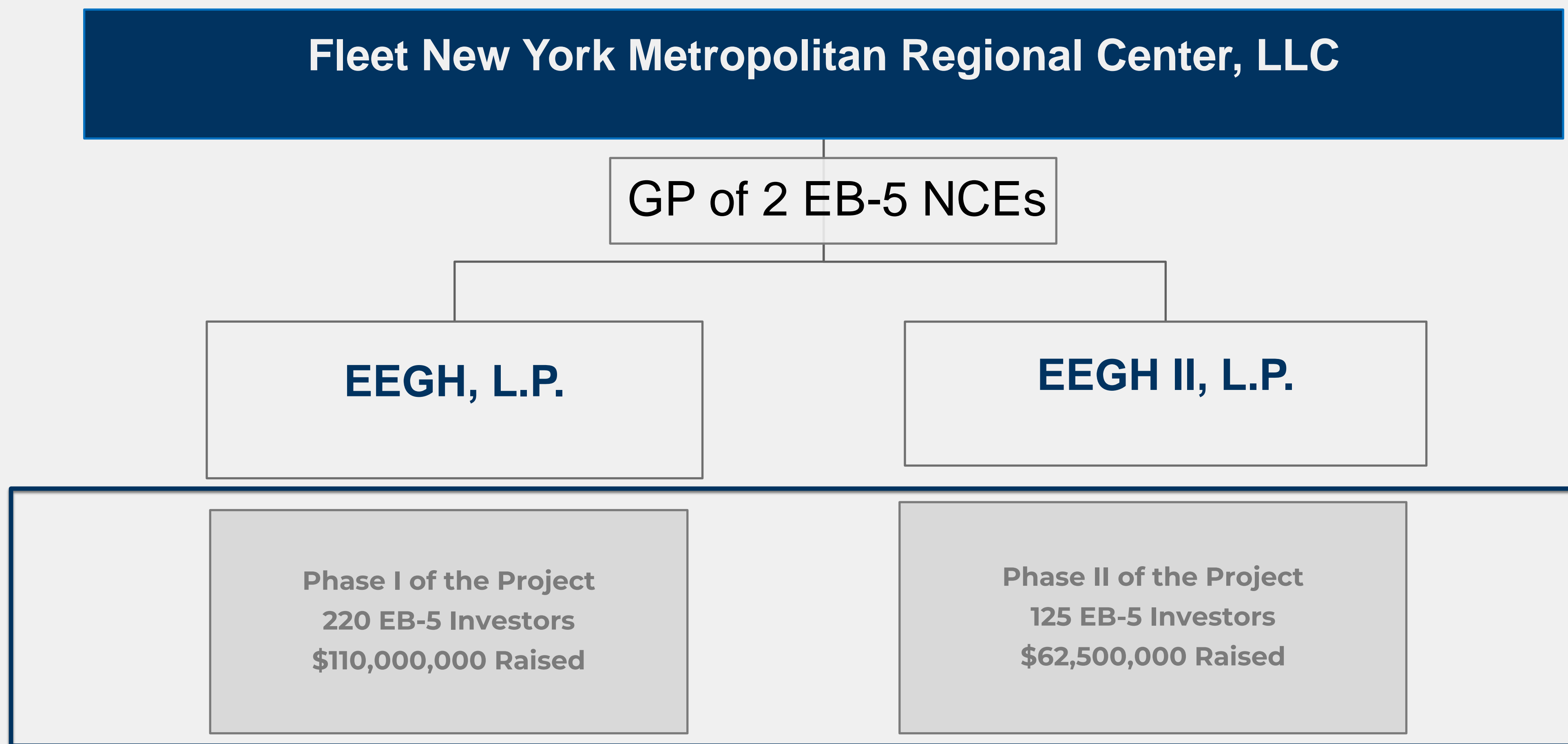
FEBRUARY 2025

STRUCTURE OVERVIEW - EASTERN MIRAGE PROJECT



The Eastern Mirage Project raised a total of \$56 million from 112 EB-5 Investors in three EB-5 offerings across three Newly Created Enterprises (NCEs)

STRUCTURE OVERVIEW - EASTERN EMERALD PROJECT



The Eastern Emerald Project raised a total of \$172.5 million from 345 EB-5 Investors in two EB-5 offerings across two Newly Created Enterprises (NCEs)

INVESTOR IMMIGRATION STATUS SUMMARY

Investor Immigration Status	EASTERN MIRAGE			EASTERN EMERALD		TOTALS	%
	Emmco, L.P.	Emmco NQMC, L.P.	Emmco Tower, L.P.	EEGH, L.P.	EEGH II, L.P.*		
I-526 Filed	0	0	0	1	10	11	2.40%
I-526 Denied	0	0	0	0	1	1	0.22%
I-526 Withdrawn	0	0	0	1	0	1	0.22%
I-526 Approved	0	0	0	181	111	292	63.76%
I-829 Pending	1	1	1	37	3	43	9.39%
Permanent Green Card	15	68	22	0	0	105	22.93%
Gave up Green Card	0	1	2	0	0	3	0.66%
Capital Returned	0	0	0	0	1	1	0.22%
Investor Deceased	0	1	0	0	0	1	0.22%
TOTAL	16	71	25	220	126	458	100.00%

** The number of investors in EEGH II, L.P. (126) was provided by the regional center and exceeds the number of investors on the prior page by one investor. The number of investors in this table is subject to revision based on further review and analysis.*

CONSENT DECREE SUMMARY

SEC VS RICHARD XIA &
FLEET NEW YORK
METROPOLITAN REGIONAL
CENTER, LLC (“FLEET”)

Settlement Payment Amounts

PAYMENT ITEM	AMOUNT
Disgorgement	\$228,500,000
Pre-Judgment Interest	\$25,000,000
Xia Civil Penalty	\$3,101,745
Fleet Civil Penalty	\$15,538,635
TOTAL	\$272,140,380
Less Amount Paid to Date (Frozen Assets)	(\$42,500,000)
AMOUNT REMAINING	\$229,640,380*

** Payment to be made no later than 245 days from entry of the Final Judgment of the disgorgement and prejudgment interest. To the extent any Defendant and/or Relief Defendant seeks to satisfy their monetary obligations through a third-party financing, they shall provide Commission counsel with the documentation governing such financing for review and approval by Commission counsel no fewer than ten business days before any such documentation is executed*

CONSENT DECREE SUMMARY

SEC VS RICHARD XIA & FLEET NEW YORK METROPOLITAN REGIONAL CENTER, LLC (“FLEET”)

Richard Xia Restrictions / Allowable Activities

Permanently banned from, directly or indirectly, participating in the offer or sale of any security, including participating in the offer or sale of any security which constitutes an investment in a “commercial enterprise” under the EB-5 visa program and engaging in activities with a broker, dealer, or issuer, or a Regional Center designated by USCIS, for purposes of issuing, offering, trading, or inducing or attempting to induce the purchase or sale of any such EB-5 investment

Permitted to purchase securities for or selling securities from his own personal account, or, **excluding EB-5 investors**, raising capital from accredited investors or qualified purchasers for the acquisition, development, or construction of real property (except that any prohibitions or limitations arising as a consequence of the injunction in Paragraph 2(a) shall continue to apply, including the disqualification provisions of Regulation A, Regulation CF, and Regulation D)

CONSENT DECREE SUMMARY

SEC VS RICHARD XIA & FLEET NEW YORK METROPOLITAN REGIONAL CENTER, LLC (“FLEET”)

Richard Xia Restrictions / Allowable Activities

Relinquish Ownership/Control of Fleet. Within 90 days of entry of the Final Judgment, certify, in writing and under oath, that defendant Xia has relinquished control and ownership, directly or indirectly, of Fleet, and detailing the person(s) or entity(ies) who have assumed control and ownership of Fleet and who must be independent from Xia, and that Xia shall not seek to regain control and/or ownership, directly or indirectly, of Fleet until the Projects are complete and all EB-5 investors in the Projects have received their permanent green cards.

Fleet can continue to serve as Regional Center for the projects. Fleet is not barred from continuing to serve as a Regional Center for the Projects, as well as any redeployment activities of the above Projects, subject to any action of or decision by USCIS, so long as Fleet is owned and controlled, directly and indirectly, by a person or persons other than and who are independent from Xia, until those Projects are complete and all EB-5 investors in the Projects have received their permanent green cards.

CONSENT DECREE SUMMARY

SEC VS RICHARD XIA &
FLEET NEW YORK
METROPOLITAN REGIONAL
CENTER, LLC (“FLEET”)

EB-Loans / Security Interest

EB-5 NCE (“Lender”)	Borrowing Entity
EMMCO, L.P.	Not disclosed in PPM
EMMCO NQMC, L.P.	Fleet Financial Group, Inc.*
EMMCO TOWER, L.P.	Fleet Financial Group, Inc.*
EEGH, L.P.	Eastern Emerald Group, LLC
EEGH II, L.P.	LaGuardia Performance Center, LLC

* A real estate management and development company affiliated with the General Partner (i.e., the regional center)

Per the Consent Decree: The following constitutes the Collateral as to which Defendant Richard Xia shall grant to the SEC a **senior security interest**:

1. The Eastern Mirage Project, including all buildings, real estate, equipment, and other property (*note: Emerald Creek Capital LLC has a security interest in Eastern Mirage*).
2. The Eastern Emerald Project, including all buildings, real estate, equipment, and other property.
3. The property located at 144 Kings Point Drive, West Hempstead, NY, including all buildings, real estate, equipment, and other property.